

ORDER:

Motion granted.

Hearing is set for
August 14, 2014,
at 4:00 P.M.

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

)
NO. 3:14-mj-03266

v.

) MAJ. JUDGE BRYANT

JOSE NAVARETTE BRAVO, Defendant

)

IN RE:

)

NCR, Juvenile Material Witness

)

and JCVR, Juvenile Material Witness

)

*John Bryant,
USM*

**MOTION FOR HEARING ON RELEASE
ASKING FOR AUGUST 14 OR 15**

The Material Witnesses through counsel hereby moves to for a hearing on Thursday, August 14 (at or after 4:00 pm) or if not possible, Friday, August 15 (at or after 4:00 pm). The U.S. is expected to agree to release on recognizance and has expressed that if Mr. Vincent cannot be there, another AUSA would be able to handle the hearing. Time is of the essence here, as Material Witnesses herein are minors held for more than thirty days now without charge, as witnesses only, since their arrest on June 26, 2014. AUSA Van Vincent suggested that, since the U.S. has already got the deposition of NCR, who has fully cooperated; since the U.S. will have got JCVR's deposition on August 14; and since the US position will be to release on recognizance, the hearing should be very short with no witnesses and a quick completion. NCR and JCVR are siblings, and seek disposition together to ensure they are not separated and can look after each other.

RESPECTFULLY SUBMITTED,

/s/ James Kevin Cartwright
JAMES KEVIN CARTWRIGHT
P. O. Box 184
Clarksville, Tennessee 37040
Tel. (931) 647-3999

/s/ Kyle F. Mothershead
KYLE F. MOTHERSHEAD